

APPENDIX

Timing of Incident with Audio

(Audio recording is from the body-microphone worn by Deputy Urban)

- 1. On Friday August 20, 2010, Washtenaw County Sheriff's Office (WCSO) Deputy Sean Urban (Deputy Urban or Urban) and others are requested to provide assistance to Detective Michael Marocco on a LАWNET drug investigation at 8707 Heather Drive, Ypsilanti, Michigan, 49198.**

Activity	Audio	Audio Time
Approx. 5:00 p.m., Deputy Urban is traveling in a fully marked WCSO patrol unit, wearing an approved class "B" uniform. Prior to the investigation, officers are advised that the township has received several citizen complaints of drug activity at and near 8707 Heather Drive. ¹		

- 2. Deputy Urban is directed to make direct contact with Mr. Stanley Jackson (Mr. Jackson or Jackson) and the second subject.**

Activity	Audio	Audio Time
Detective Marocco requests Deputy Urban make direct contact with 2 persons in the driveway of 8707 Heather Dr. regarding observed drug transactions. ² Deputy Urban exits patrol car. ³	"Hey, what's going on partner? Come here a second." (Urban)	15:29:16

- 3. Jackson runs, and a foot pursuit ensues into the house, with Deputy Urban giving verbal warnings that Jackson ignores.**

Activity	Audio	Audio Time
Jackson grabs his waistband and runs into the garage. Deputy Urban gives verbal commands to stop, unholsters his TASER® X26™ Electronic Control Device (ECD) and gives TASER warning. The pursuit continues into the kitchen of the residence. Jackson continues to ignore commands. ⁴	"I didn't do it, man." (Jackson) "Stop." (Urban) "I did not do it, man." (Jackson) "Stop. I'll tase you." (Urban)	15:29:20

¹ Exhibit 1, Urban report, bates 0028.

² Exhibit 1, Urban report, bates 0028.

³ Exhibit 1, Urban report, bates 0028.

⁴ Exhibit 1, Urban report, bates 0029.

4. Jackson stops and turns; Deputy Urban fears Jackson is brandishing a weapon and deploys his ECD in probe-mode.

Activity	Audio	Audio Time
Jackson stops between the kitchen and living room and turns toward Deputy Urban. As Jackson turns, Urban fears Jackson is brandishing a deadly weapon from his waistband; Urban deploys his ECD in probe-mode; Jackson falls to the floor. ⁵	1 st TASER X26 ECD discharge, probe-mode, by Deputy Urban [TASER ECD Data Download (Urban), Seq. 0089, ECD discharge duration: 5 seconds, bates 0227]	15:29:28

5. Deputy Urban attempts to handcuff Jackson. WCSO Deputy Tom Mercure (Deputy Mercure or Mercure) enters the house and tries to assist.

Activity	Audio	Audio Time
Deputy Urban continues verbal commands in an effort to handcuff Jackson. Jackson's muscles are tense and Urban is unable to handcuff him. ⁶	"Turn around and put your hands behind your back." (Urban)	15:29:33
	"Put your hands behind your back." (Urban)	15:29:36
Deputy Mercure runs into the house to assist Deputy Urban. Mercure sees Jackson on his back on the kitchen floor with Urban giving loud, clear commands for Jackson to roll onto his stomach. Deputy Mercure sees one ECD wire-lead on Jackson's hat but doesn't see the other lead. ⁷	"Watch over there." (Urban to Mercure)	15:29:37
	"Hands behind your back. Right now." (Mercure).	15:29:40
Deputy Urban is able to get a handcuff on Jackson's left wrist. Deputy Mercure is able to get a cuff from a separate set of handcuffs on Jackson's right wrist, but they are unable to roll Jackson over to complete the handcuffing. ⁸	"Turn around." (Urban)	15:29:41
	"Right now. Behind your back or we do it again." (Mercure)	15:29:42

⁵ Exhibit 1, Urban report, bates 0029.

⁶ Exhibit 1, Urban report, bates 0029.

⁷ Exhibit 1, Urban report, bates 0029; Mercure report, bates 0033.

⁸ Exhibit 1, Urban report, bates 0029; Mercure report, bates 0034.

6. The Deputies (Urban and Mercure) attempt to calm Jackson and call for an ambulance.

Activity	Audio	Audio Time
The Deputies note that Jackson is tense and displaying signs of muscle contractions; Deputy Mercure report that Jackson begins to salivate and is not blinking his eyes. The officers attempt to calm Jackson. ⁹	“Turn around...Stiffened up.” (Urban)	15:29:46
	“Alright, buddy.” (Urban)	15:29:54
	“Take a deep breath, relax.” (Mercure)	15:29:56
	“Work through it, work through it.” (Mercure)	15:30:03
	“There you go.” (Mercure)	15:30:05
	“Alright, there you go” (Mercure)	15:30:07
	“There you go, turn around, on your stomach.” (Urban)	15:30:08
	“On your stomach, bro.” (Mercure)	15:30:10
	“You alright, buddy?” (Urban)	15:30:33
Deputy Mercure notifies Washtenaw County dispatch to send an ambulance with a priority response. ¹⁰	“43...Start HVA” (Mercure)	15:30:41
	“Hey, can you hear me, partner?” (Urban)	15:30:42
	“8708...07...Heather...Heather...Taser deployed, we need a pick-up” (Mercure)	15:30:47
Deputies Urban and Mercure continue to try to calm Jackson and get him to control his breathing. ¹¹	“Partner, can you hear me? (Mercure)	15:30:57
	“Look up at me.”	15:30:57
	“Can you see me?” (Urban)	15:31:00
	“Can you see me?” (Mercure)	15:31:01
	“43...Have them come priority.” (Mercure)	15:31:11
	“Hey partner. Can you hear me alright.” (Urban)	15:31:13
	“There you go. C’mom.” (Mercure)	15:31:22

⁹ Exhibit 1, Urban report, bates 0029; Mercure report, bates 0034.

¹⁰ Exhibit 1, Mercure report, bates 0034.

¹¹ Exhibit 1, Urban report, bates 0029; Mercure report, bates 0034.

Activity	Audio	Audio Time
	"You alright?" (Urban)	15:31:23
	"Hang on." (Urban)	15:31:25
	"Hang on. We got help coming." (Mercure)	15:31:26
	"Hang on." (Mercure)	15:31:28
	"Stay right here, partner." (Mercure)	15:31:30
	"Hang on... Hang on." (Mercure)	15:31:33
	"Relax. You just gotta relax." (Mercure)	15:31:34
	"Relax." (Mercure)	15:31:35
	"Lay your head down." (Mercure)	15:31:36
	"Relax." (Mercure)	15:31:37
	"Lay your head down." (Mercure)	15:31:38
	"Lay your head down." (Urban)	15:31:42
	"There you go." (Mercure)	15:31:43
	"Relax." (Mercure)	15:31:44
	"Relax." (Mercure)	15:31:46
	"Relax." (Mercure)	15:31:50
	"There you go." (Mercure)	15:31:51
	"Hang on." (Urban)	15:31:52

7. Jackson's condition improves. The Deputies continue to calm Jackson.

Activity	Audio	Audio Time
Deputy Mercure reports that Jackson's condition begins to improve, and he and Deputy Urban try to finish handcuffing Jackson. Mercure is concerned that Jackson will come out of his calm condition and become combative again. ¹²	"There you go, buddy." (Mercure)	15:31:55
	"Relax." (Urban)	15:31:56
	"Can you hear me?" (Mercure)	15:31:57
	"You just gotta hold on, buddy."	15:31:58
	"You alright?"	15:32:01

¹² Exhibit 1, Mercure report, bates 0034.

Activity	Audio	Audio Time
Deputy Urban reports that as Jackson began to un-tense, they are finally able to turn him over from his back to his stomach in an attempt to finish handcuffing. ¹³	"Can you talk?"	15:32:03
	"Talk to me, buddy."	15:32:04
	"Alright."	15:32:07
	"Talk to me...Talk to me." (Mercure)	15:32:08
	"Hold on." (Urban)	15:32:10

8. After Jackson's condition improves, he becomes combative again.

Activity	Audio	Audio Time
Once Jackson is on his stomach, he begins to actively resist again as the Deputies continue to try to complete the handcuffing. Deputies Urban and Mercure each hold an arm and continue using muscling techniques to hold Jackson to the floor.	"Relax and stay down." (Mercure)	15:32:13
	"Stay down."	15:32:14
Jackson physically resists the Deputies' attempts to muscle his arms away from his body as they try to handcuff him. Jackson resists by holding his arms close to his body and screaming unrecognizable statements. ¹⁴	"Stay down."	15:32:15
	"Hold on."	15:32:19
	"Nope, stay down."	15:32:20
	"Nope, stay down. Stay here."	15:32:21
Deputy Mercure reports that Jackson attempts to pull his arms toward his stomach area, while he and Deputy Urban hold Jackson by the handcuffs. The struggle continues. Jackson refuses to comply with commands to put his hands behind his back and keeps pulling his arms forward. The Deputies are finally able to place Jackson on his back but he then struggles to place his arms in front of himself, which causes Deputy Mercure concern if Jackson is attempting to reach for a concealed weapon. Jackson continues to actively fight and resist the Deputies. ¹⁵	"Hold on."	15:32:25
	"Nope, stay down." (Mercure)	15:32:35
	"Stay here. Hold on." (Urban)	15:32:37
	"Does he have any weapons on him?" (Mercure)	15:32:46
	"You alright." (Urban)	15:32:48

¹³ Exhibit 1, Urban report, bates 0029.

¹⁴ Exhibit 1, Urban report, bates 0029.

¹⁵ Exhibit 1, Mercure report, bates 0034.

9. Second TASER ECD discharge (drive stun). Jackson continues to aggressively struggle with the Deputies.

Activity	Audio	Audio Time
Jackson's physical aggression escalates. The two Deputies are unable to control Jackson as he continues to wrestle away from them. ¹⁶	"Nope, he's gonna' do it again." (Mercure)	15:32:50
Yelling by Jackson, verbal commands by the Deputies, the physical struggle and another TASER ECD warning by Deputy Urban are heard on the audio recording.	"Stay right here." (Urban) "Stop resisting." (Urban) "I'm gonna tase you again." (Urban) "Stop resisting." (Urban) "Get on your stomach."	15:32:52 15:33:11 15:33:12 15:33:14 15:33:15
Deputy Mercure unholsters his TASER X26 ECD. Urban removes the air cartridge from Mercure's ECD, while Mercure holds onto Jackson's right wrist. Mercure discharges his ECD in drive-stun mode on Jackson's upper back, right side. ¹⁷ Jackson continues his struggle to resist handcuffing and continues to reach for his beltline. ¹⁸	2nd TASER X26 ECD discharge, drive-stun, by Deputy Mercure. [TASER ECD Data Download (Mercure), Seq. 0171, ECD duration: 3 seconds, bates 0234].	15:33:16

10. A third officer, WCSO Deputy Holly Farmer (Deputy Farmer or Farmer), arrives. Jackson continues to aggressively struggle with the Deputies. The third ECD discharge (drive stun), unknown if it made contact with Jackson.

Activity	Audio	Audio Time
Deputy Farmer enters the residence. She notes that an ECD has been discharged, and despite this, Jackson is still actively resisting, kicking his legs and trying to get his arms under his body. Deputy Farmer advises Jackson to calm down and lie on his stomach. ¹⁹	"Get on your stomach." "Get on your stomach."	15:33:23 15:33:25

¹⁶ Exhibit 1, Urban report, bates 0029.¹⁷ Exhibit 1, Mercure report, bates 0034.¹⁸ Exhibit 1, Mercure report, bates 0034.¹⁹ Exhibit 1, Farmer report, bates 0038.

Activity	Audio	Audio Time
Jackson pulls his arm away from a Deputy who had put a handcuff on his wrist. The handcuff has an open bail. Deputy Farmer grabs the handcuff and struggles with Jackson to hold onto it, for fear that if she lets go of the handcuff the serrated edge of the open handcuff would seriously injure someone. ²⁰		
Deputy Mercure reports they are rolling on the floor with Jackson. Farmer gains control of Jackson's right arm, as Urban and Mercure try to bring Jackson's left arm behind his back. ²¹ Deputy Mercure unholsters his TASER ECD again, with the air cartridge already disconnected. As he is getting ready to activate the ECD, Jackson rolls onto his stomach. Mercure could not recall if this drive-stun made contact with Jackson. ²²	3 rd TASER X26 ECD discharge, drive-stun, by Deputy Mercure – unknown if it made contact with Jackson. [TASER ECD Data Download (Mercure), Seq. 0172, ECD duration: 5 seconds, bates 0234].	15:33:31

11. A fourth deputy, WCSO Deputy Dean Reich (Deputy Reich or Reich), arrives. Jackson tries to bite Deputy Farmer. Jackson continues his struggle despite a fourth (final) ECD discharge (drive stun).

Activity	Audio	Audio Time
Deputy Reich arrives. He sees Deputies Urban, Mercure and Farmer actively struggling with Jackson, attempting to apply handcuffs. Jackson is still twisting and turning while pulling his arms away from the Deputies. Deputies Mercure and Urban attempt to gain control of Jackson's left arm, while Deputy Farmer attempts to gain control of Jackson's right arm. ²³	"Get on your stomach." (Urban) "Get on your stomach." (Mercure) "Get on your stomach." (Mercure) "Give me your hand." (Urban) "Give me your hand." (Urban)	15:33:48 15:33:52 15:33:55 15:34:09 15:34:11
Deputy Farmer reports that her arm becomes trapped between Jackson's head and his handcuffed arm. She sees Jackson move his head to her arm, observes Jackson open his mouth and attempt to bite her arm. When Jackson touches his mouth to her skin, she responds by delivering a quick jab to the side of his jaw. ²⁴	"Don't bite." "Get your hands behind your back." (Urban)	15:34:24 15:34:27

²⁰ Exhibit 1, Farmer report, bates 0038.

²¹ Exhibit 1, Mercure report, bates 0034.

²² Exhibit 1, Mercure report, bates 0034.

²³ Exhibit 1, Reich report, bates 0041.

²⁴ Exhibit 1, Farmer report, bates 0038; Mercure report, bates 0034.

Activity	Audio	Audio Time
Deputy Reich secures Jackson's legs so that Jackson can no longer twist onto his back. Reich then assists Deputies Urban and Mercure to gain control of Jackson's left arm. One set of handcuffs is applied to Jackson's left wrist as he continues to pull away from the officers' grasp. Deputies Reich and Urban attempt to gain control of Jackson's left arm. They are able to secure the handcuffs to Jackson's belt. ²⁵	"Get your hands behind your back." (Urban)	15:34:40
	"Get your hands behind your back. Lay down." (Urban)	15:34:45
	"Get your hands behind your back." (Urban)	15:34:51
Deputy Reich then assists Deputy Farmer gain control of Jackson's right arm, Jackson continues to pull his right arm away from their grasp, and Deputy Urban drive-stuns Jackson with his ECD. Jackson continues to actively resist by pulling away from their grasp. ²⁶	4 th (and final) TASER X26 ECD drive-stun, by Deputy Urban. [TASER ECD Data Download (Urban), Seq. 0090, ECD duration: 5 seconds, bates 0227]	15:34:52
Jackson had fled and actively resisted the Deputies for over five minutes, during which TASER ECDs were discharged four times (total ECD discharge time of 18 seconds: 5 sec., 5 sec., 3 sec., 5 sec.). Jackson continues to actively struggle with the Deputies, and continues to reach for his beltline ²⁷ for over five more minutes as the Deputies continue to try to calm him down. ²⁸		

12. The four Deputies are finally able to secure handcuffs on Jackson. There are no more ECD discharges. Stanley Jackson continues to actively resist for over four additional minutes.

Activity	Audio	Audio Time
Deputy Farmer gains control of Jackson's right arm; Deputy Mercure repositions himself to Jackson's right side to assist Farmer, and then handcuff Jackson's right arm to the handcuff on Jackson's left wrist. Once secure, Jackson's right arm is then secured behind his back as he continues to violently struggle. ²⁹	"Are you alright?" (Urban to Farmer)	15:35:20
	"You need to relax." (Urban to Jackson)	15:35:22
	"Stay right there." (Farmer)	15:35:26

²⁵ Exhibit 1, Reich report, bates 0041.

²⁶ Exhibit 1, Reich report, bates 0041; Urban report, bates 0029.

²⁷ Exhibit 1, Mercure report, bates 0035.

²⁸ Exhibit 3, Audio – 15:34:52 – 15:40:05.

²⁹ Exhibit 1, Urban report, bates 0029; Mercure report, bates 0034-0035; Farmer report, bates 0038.

Activity	Audio	Audio Time
It takes four Deputies to gain control over Jackson to secure handcuffs on him. After the handcuffs are secured there are no more TASER ECD discharges.		
Deputy Reich reports that Jackson continues to try to pull away even after the handcuffs have been secured. ³⁰		
Deputy Farmer gets up off the floor, asks if the house has been secured, is advised “no” by Deputy Urban, and begins to search the residence. ³¹	“Is the house cleared?” (Farmer) “No” (Urban to Farmer)	15:35:29 15:35:30
Deputy Farmer asks if anyone has been in the other rooms. Deputy Mercure responds, “no.” Deputy Farmer secures the residence, finding no other persons inside. ³²	“Do you know if anybody’s in here?” (Farmer) “I don’t know, Holly,”	15:35:52 15:35:55

13. The Deputies continue to try to calm Stanley Jackson by talking to him and helping him set up to a seated position. Jackson continues to struggle and resist.

Activity	Audio	Audio Time
Deputies Reich, Mercure, and Urban also attempt to set Jackson up in a seated position against the refrigerator, but Jackson continues to twist and gyrate. ³³ Jackson continues his aggressive movements, and continues to kick around the kitchen floor. ³⁴	“Relax.” (Urban) “Relax.” (Urban) “Relax.” (Urban) “Hey... You need to relax.” (Urban) “You gonna’ relax?” (Urban) “You gotta’ relax right now.” (Urban) “You gonna’ relax?” (Urban) “Let me tell you, when you relax. I’ll let you up.” (Urban) “Catch your breath.” (Urban)	15:36:40 15:36:50 15:36:57 15:37:05 15:37:34 15:37:36 15:37:38 15:37:44 15:37:47

³⁰ Exhibit 1, Reich report, bates 0041.

³¹ Exhibit 1, Farmer report, bates 0038.

³² Exhibit 1, Farmer report, bates 0038.

³³ Exhibit 1, Mercure report, bates 0035.

³⁴ Exhibit 1, Urban report, bates 0029-0030; Reich report, bates 0041.

Activity	Audio	Audio Time
	"You gonna' relax? You act like a man or an animal, which one?"(Mercure)	15:37:49
	"You gotta' relax." (Mercure)	15:37:54
	"You gonna' settle down, my man?"	15:37:59
	"Get off me." (Stanley Jackson)	15:38:05
	"You 'gotta' relax." (Urban)	15:38:06
	"Get off of me." (Stanley Jackson)	15:38:07
	"I ain't doing nothing." (Urban)	15:38:08

14. Stanley Jackson complains of discomfort, and the Deputies try to help him move to a more comfortable position and continue to calm him. Jackson continues to struggle and resist.

Activity	Audio	Audio Time
The Deputies try to direct Jackson to lie on his side in an attempt to calm him. ³⁵ Deputy Reich reports that as they roll Jackson onto his right side to allow him to breathe more freely, Jackson continues to twist around on the kitchen floor, kicking and screaming. ³⁶	"Get the fuck off." (Jackson)	15:35:15
	"Relax and we'll let you up."	15:38:20
	"Get off me. I can't see." (Stanley Jackson)	15:38:23
	"There you go." (Mercure)	15:38:26
	"Don't move." (Mercure)	15:38:27
	"Stay like that." (Mercure)	15:38:29
	"I'm gonna set you up, alright?" "You gotta set up." (Urban)	15:38:3015:38:37
	"You gotta set yourself up, man." (Mercure)	15:38:38
	"Set yourself up... Come here. Come here." (Urban)	15:38:41
	"Put your back up against the refrigerator." (Mercure)	15:38:46
	"There you go." (Mercure)	15:38:50

³⁵ Exhibit 1, Mercure report, bates 0035.

³⁶ Exhibit 1, Reich report, bates 0041.

Activity	Audio	Audio Time
	"Sit back up against the refrigerator."	15:38:56
	"Pick me up. Pick me up...Pick me up. Pick me up." (Stanley Jackson)	15:39:01
	"My body. I need help." (Jackson)	
	"Relax. We got help coming." (Urban)	15:39:08
	"Gotta stay up." (Urban)	15:39:10
	"Where's the ____" (Jackson)	15:39:19
	"Where's the ____ thing." (Jackson)	15:39:22
	"What thing?" (Urban)	15:39:25
	"My ____." (Jackson)	15:39:26
	"Huh?" (Urban)	15:39:27
	"Pick me up." (Stanley Jackson)	15:39:27
	"You gotta' stay here and relax." (Urban)	15:39:30
	"Pick what up?" (Urban)	15:39:33
	"Off my back." (Stanley Jackson)	15:39:34
	"No, lay on your side. Lay on your side." (Urban)	15:39:36
		15:39:37

15. Stanley Jackson continues to be uncooperative and attempts to reach for his front pants pocket. Deputy searches Jackson and finds drugs and money.

Activity	Audio	Audio Time
As the Deputies continue to try to help Jackson, he starts digging in his front pockets. Deputy Urban searches Jackson for officer safety, finds a plastic bag containing white powdery chunks in Jackson's beltline area, and US currency in his left front pant pocket. A Michigan Department of Corrections tether is on Jackson's ankle. ³⁷	"What are you digging for?" (Urban)	15:39:50
Deputy Mercure has blood and spit on his left pants and left boot from Jackson's continued active aggression while on the floor. ³⁸		

³⁷ Exhibit 1, Urban report, bates 0030; Mercure report, bates 0035.

³⁸ Exhibit 1, Mercure report, bates 0035.

16. The Deputies continue to calm Jackson so that Huron Valley Ambulance (HVA) and Superior Township Fire Department (STFD) medics can provide medical attention. Jackson remains uncooperative.

Activity	Audio	Audio Time
The paramedics talk to Jackson. He continues resisting. To stop Jackson from spitting, a mask is placed on his mouth without the tubing, leaving an air hole. ³⁹	“Don’t be afraid of HVA” (Mercure) “You need to relax.” (Urban) “Want to have the paramedics look you over? (Mercure) “Let’s have the paramedics look you over. Calm down.” (Mercure) “You have to hold yourself up...I’m not gonna’ hold you up.” (Urban) “We have the paramedics look you over, okay?”	15:39:59 15:40:02 15:40:03 15:40:05 15:40:10 15:40:12
Jackson is lifted onto an HVA stretcher on his back and strapped in. Deputy Urban asks a paramedic to remove the mask so that he can take a photograph. When the mask is removed, Jackson spits on Deputy Urban’s face. ⁴⁰		
Medics complete an assessment of Jackson upon arrival at the residence: Respiratory System: Breathing rate–rapid; Breathing quality–unlabored; Cardiovascular System: Skin color–normal, Temperature–normal, Condition–normal Neurological System: Mental status – alert. ⁴¹ Paramedics transport Jackson out of the house. ⁴²		

³⁹ Exhibit 1, Urban report, bates 0030; Mercure report, bates 0035; Reich report, bates 0041.

⁴⁰ Exhibit 1, Mercure report, bates 0035.

⁴¹ Exhibit 1, EMS Transport Sheet, bates 0174.

⁴² Exhibit 1, Mercure report, bates 0035; Reich report, bates 0041; EMS Transport Sheet, bates 0174.

17. Drugs, cash and cell phones on the kitchen table are photographed and secured as evidence.

Activity	Audio	Audio Time
Deputy Urban sees two sandwich bags containing a green leafy plant material located on the kitchen table, and several cigars next to the sandwich bags. ⁴³ Deputy Mercure sees plastic bags with what appear to be marijuana on the kitchen table. ⁴⁴		
The sandwich bags of marijuana and cocaine, and the US currency are placed on the kitchen table, next to the other drugs and cell phones found there. All are photographed and turned over as evidence. ⁴⁵		

18. Medics report that Jackson remains combative throughout transport to the hospital.

Activity	Audio	Audio Time
Medics are only able to complete a partial assessment of Jackson en route to the hospital, reporting that Jackson is warm and dry with good coloration, and otherwise no changes in his condition, but cannot obtain vital signs due to his refusal to speak, yelling and fighting his restraints. "He remains combative, thrashing and shaking the cot while attempting to break free from his restraints. Pt also continues to attempt to spit while enroute to the hospital." ⁴⁶		
Upon arrival at the hospital, Jackson is taken from the ambulance to a room on a stretcher. ⁴⁷		

⁴³ Exhibit 1, Urban report, bates 0030.

⁴⁴ Exhibit 1, Mercure report, bates 0035.

⁴⁵ Exhibit 1, Mercure report, bates 0035; Photographs at scene, bates 0237, 0238.

⁴⁶ Exhibit 1, EMS Transport Sheet, bates 0174.

⁴⁷ Exhibit 1, EMS Transport Sheet, bates 0174.

19. Hospital security personnel report that Jackson continues to be combative at the hospital.

Activity	Audio	Audio Time
<p>“The ambulance crew informed all present the patient had been “Tasered” by Deputies and extremely combative. They further informed he was a “spitter.” Due to the still combative actions of the patient, Security was requested to place the patient into hospital four-point restraints. For safety of all involved clinical restraints were placed on both wrists and both ankles of the patient while still on the ambulance stretcher. The patient continued to be combative as he was transferred onto the ER bed and was restrained o the bed at the ankles. As Security and medical staff attempted to set the patient in an upright position to remove the handcuffs and secure clinical restrains to the bed he became extremely combative and kept yelling in a very loud tone. It was determined at that time it was unsafe to remove the handcuffs and the patient was placed back into lying position, still handcuffed and restrained at the ankles.”⁴⁸</p>		

20. Medical personnel administer Ativan [Lorazepam] (2 mg IM) to Jackson to calm him. Within a few minutes, Jackson quits breathing and dies, despite resuscitation efforts.

Activity	Audio	Audio Time
<p>“Course in the emergency department: the patient presented and was extremely agitated. When I walked in the room he was on his back and yelling. His hands were in cuffs behind him and restraints tied to the bed. He was given 2 mg IM Ativan for sedation. He calmed down within about 1-2 minutes and they took the handcuffs off of the patient while in the seated upright position. We removed a taser lead found in his back. While the cuffs were being removed, it was noted that he was no longer breathing. He[sic] put him down and we checked for pulses which were absent. Chest compressions were initiated immediately, we started a line, gave him oxygen, and put him on a cardiac monitor. The monitor showed asystole.”⁴⁹</p> <p>“Time of death was 1820 total time of resuscitative efforts was 40 minutes.”⁵⁰</p> <p>“Final impression: 1) cardiac arrest 2) potential drug overdose.”⁵¹</p>		

⁴⁸ Exhibit 1, St. Joseph Hospital Security Department records, bates 0196.

⁴⁹ Exhibit 1, St. Joseph Hospital records, ED Physician Notes, bates 0164, 0165.

⁵⁰ Exhibit 1, St. Joseph Hospital records, ED Physician Notes, bates 0165.

⁵¹ Exhibit 1, St. Joseph Hospital records, ED Physician Notes, bates 0165.